

**Exhibit A**

Proposed Order

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

In re:

The Diocese of Buffalo, N.Y.,

Debtor.

Case No. 20-10322

Chapter 11

**ORDER ALLOWING DISCLOSURE OF  
CONFIDENTIAL PROOF OF CLAIM NO. 608 FOR  
INVESTIGATION PURPOSES PURSUANT TO BAR DATE ORDER**

Upon the motion of the Diocese of Buffalo, N.Y. (the “Diocese”) for entry of an order allowing disclosure of Confidential Sexual Abuse Proof of Claim Number 608 (“Claim 608”) for investigation purposes pursuant to the Bar Date Order (the “Motion”),<sup>1</sup> and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334(b); and it appearing that venue of the Chapter 11 Case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having determined that the relief requested in the Motion is in the best interests of the Diocese, its estate, its creditors and other parties in interest; and it appearing that proper and adequate notice of the Motion has been given under the circumstances and that no other or further notice is necessary; and after due deliberation thereon; and good and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. Pursuant to the *Order Establishing August 14, 2021 Deadline For Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof* [Docket No. 729] (the “Bar Date Order”), the Accused Priest, the Investigators, the members of the Review Board, and the District

<sup>1</sup> Capitalized terms used but not defined in this Order shall have the meanings ascribed to them in the Motion.

Attorneys are designated as limited Authorized Parties under the Bar Date Order for purposes of Claim 608 and the Diocese shall be authorized to provide them copies of Claim 608 redacted to show only (i) the identity and contact information (including counsel where applicable) for the alleged perpetrator, (ii) the identity of the claimant in Claim 608 (along with contact information of counsel for the claimant), and the identity of any witnesses identified in a Sexual Abuse Proof of Claim, and (ii) details of the alleged acts of abuse (*i.e.*, the time, place, and manner of the alleged abuse).

3. The Accused Priest, the Investigators and the Review Board shall keep all information relating to Claim 608 confidential in accordance with the Confidentiality Protocol set forth in the Bar Date Order.

4. To the extent this Order is inconsistent with the Bar Date Order, this Order controls.

5. The Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

Dated: \_\_\_\_\_, 2022  
Buffalo, New York

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Hon. Carl L. Bucki  
Chief United States Bankruptcy Judge